CERTIFICATE OF SERVICE

I, Lisa Saunders, hereby certify that a copy of the foregoing "JOINT REPLY COMMENTS OF THE UNIVERSITY OF COLORADO AND SANGRE DE CRISTO COMMUNICATIONS, INC." was sent on this 27th day of September, 1993, via United States mail, postage prepaid, unless otherwise indicated, to the following:

- * Michael C. Ruger
 Chief, Allocations Branch
 Policy and Rules Division
 Mass Media Branch
 Federal Communications
 Commission
 1919 M Street, N.W., Room 318
 Washington, DC 20554
- * Roy J. Stewart
 Chief, Mass Media Bureau
 Federal Communications
 Commission
 1919 M Street, N.W., Room 314
 Washington, DC 20554
- * Barbara Kreisman
 Chief, Video Services Division
 Federal Communications
 Commission
 1919 M Street, N.W., Room 702
 Washington, DC 20554

* Clay Pendarvis
Chief, Television Branch
Federal Communications
Commission
1919 M Street, N.W., Room 700
Washington, DC 20554

Richard Hildreth, Esq. Fletcher, Heald & Hildreth 1300 North 17th Street 11th Floor Rosslyn, Virginia 22209

James L. Winston, Esq. Rubin, Winston, Diercks, Harris & Cooke 1739 M Street, N.W. Washington, DC 20036

Augunders
Lisa Saunders

Denotes Hand Delivery

FOO MAIL SECTION FOO MAIL SECTION WASHINGTON, D.C. 20554

FER 28 1991

IN REPLY REFER TO:

Thomas Aube
University of Southern Colorado
2200 Bonforte Blvd.
Pueblo, CO 81001

Re: Station KTSC(TV)
Pueblo, CO
BPET-90012ZKE

Dear Mr. Aube:

This is with respect to the above-captioned application of the University of Southern Colorado (University) for a modification of licensed facilities for noncommercial educational Station KTSC(TV), Channel 8, Pueblo, Colorado. Your application is opposed by the Association for Maximum Service Telecasters, Inc. (AMST), which filed an informal objection on February 26, 1990.

Your present transmitter site is located on Baculite Mesa, approximately eight miles north of Pueblo. Although Colorado Springs lies partly within the station's predicted principal community contour, intervening terrain prevents an adequate signal from reaching that community. Coverage of that community is important, you state, because of the various educational and outreach services the University offers there. Thus, until August 1990 you had utilized a television translator on Channel 53 to provide service to Colorado Springs, until forced off the air by a new full-power station on that channel. You state that you have been unable to find a new channel on which your translator could operate and that your modification application is an effort to find a site which could serve both Pueblo and Colorado Springs. You now propose to construct a tower on Cheyenne Mountain in an antenna farm southwest of Colorado Springs. That site is 296.1 kilometers (184.0 miles) from co-channel Station KUCT(TV), Grand Junction, Colorado, and 291.9 kilometers (181.4 miles) from the reference point for a co-channel allocation in Laramie, Wyoming. Section 73.610(b) requires a minimum separation of 304.9 kilometers (189.5 miles) in this part of the country. Accordingly, your proposed site is 8.8 kilometers (5.5 miles) short-spaced to Station KJCT(TV) and 13.0 kilometers (8.1 miles) short-spaced to the Laramie allocation. Accordingly you request waiver of the Rule. You also seek waiver of Section 73.685(e) of the Rules because the ratio of the maximum-to-minimum radiation of your proposed directional antenna would exceed 10 dB.

In support of your waiver request of Section 73.610, you argue that there are only three sites at which you could locate and provide a predicted signal to both Pueblo and Colorado Springs without running afoul of local zoning restrictions. The first is your present site, but you argue that intervening terrain prevents a viewable signal from reaching Colorado Springs. The second potential site is approximately eight miles north of your current site;

north and west of the proposed site is mountainous towards both Grand Junction and Laramie and that no objectionable interference would result. Additionally, you contend that you will afford equivalent protection to the Grand Junction station and a future co-channel station in Laramie.

In opposition, AMST argues that you have not made the threshold showing that no fully spaced sites, including its present site, are available. It further asserts that you have not made a Compelling public interest justification necessary for waiver of the Rules.

After careful review of your application, we are persuaded that grant of your waiver requests would serve the public interest. The Commission is mindful of the unique role played by many noncommercial television stations in providing public television service to wide areas. You have established that the University serves both the Pueblo and Colorado Springs areas and that it is 1 therefore important that your television station do so as well. You have unsuccessfully attempted to find another translator to serve Colorado Springs, and it would not be possible at this time to seek a new television channel, since there is currently a freeze on the filing of new applications in that part of the country. Further, it does not appear that you could modify the facilities of your current site sufficiently to provide a viewable signal in Colorado Springs. Consequently, your only alternative is to seek a new site, and we believe that you have demonstrated the unsuitability of any other sites from which you could serve both communities. We further note that, while there would be some loss areas to the south and east of Pueblo, these areas are largely unpopulated. Additionally, we agree that the mountainous terrain and your offer to reduce effective radiated power to the north and west would greatly reduce the possibility that objectionable interference to the Grand Junction station or to a future station in Laramie would occur. Finally, we note that Station KJCT(TV) in Grand Junction has not opposed your proposal. Therefore, we believe that waiver of Section 73.610 is warranted. We will also grant your request for waiver of Section 73.685, because the directional antenna pattern you propose would minimize the potential for ghosting. Additionally, that antenna pattern will enable you to provide the equivalent protection mentioned above.

Accordingly, for the reasons stated above, the informal objection filed by AMST IS DENIED, your requests for waiver of Sections 73.610 and 73.685 ARE GRANTED, and your application to modify the station's facilities IS GRANTED subject to the following conditions:

The maximum visual effective radiated power at azimuth 348 degrees True toward the Channel 8 allocation for Laramie, Wyoming, shall not exceed 21.3 dBk (135 kW).

The maximum visual effective radiated power at azimuth 278 degrees True toward Station KJCT(TV), Grand Junction, Colorado, shall not exceed 22.0 dBk (158 kW).

The application for license shall include:

- a. Horizontal plane radiation pattern obtained from measurements performed by the manufacturer for the transmitting antenna prior to its installation.
- b. Vertical radiation patterns obtained from measurements by the manufacturer for the transmitting antenna prior to its installation for at least the azimuth toward the Channel 8 allocation in Laramie and toward Station KJCT(TV).
- c. An affidavit by a qualified and licensed surveyor that the proper azimuthal orientation of the transmitting antenna achieves radiation limitations prescribed above for the Channel 8 allocation in Laramie and Station KJCT(TV).

Sincerely,

Barbara A. Kreisman Chief, Video Services Division Mass Media Bureau

co: Wayne Coy, Jr., Esq. William H. Fitz, Esq.

1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	1€ 3 € 3 € 3	#12581 6 2	v.c
98.45 TELECOMM 4(CACOM) 98.75 Ab. 6. 1	0 0 0 0 0 0 0 0 0 0	•₹+000 07 (05 05 05 05 05 05 05 05 05 05 05 05 05 0	- 大学会 構造で表示 東京 学文を () (4) (4)
minon amenoment	941219 AMENUES 12/19/94, 10 INCLU	eb∉ s	
	12 931012 931021 14 920104 920729	931026 60 920729 60	00 940426 00 930730
	7 416117 410405		00 930305
	3 900703 900712	911024 60	00 950454
	# 917227 910307 C 901120 901119	919618 69 919489 69	00 911218
ninca amenament	910402 *AMEMBED 04-02-91: AM ITEM		7.0
minos Amendment	910108 *AMENDED 01-08-91: FACSIMI	ii t	
MINOR AMENDMENT	901217 AMENDED 12-17-90 TO THE AS		
相信物分数 高期医检查师医检查 解耳触位数 高种产物的种类和工	901217 AMEMOFO 12-17-90 TO THE AS 901212 AMEMOED 12-12-90 TO THE AS		
HINOR AMENDMENT	901212 AMENDED 12-12-90 TO THE AS	\$16N	
	3 910103 910114	910409 60	00
	2 890522 890605 1 891221 900102	890607 60 891229 60	00 900702
	3 890703 890710		00 900172
	9 881219 881228	890517 60	01
THEMPHAMA SONIA OSEGOS 4 THEMPHAMA SONIA	### ##################################		00 890702
1 990950KT b 960950	0 400402 400854 801004 401152 41040	1 8/0401 00 00-401	00 940,05
WEVU ELCOM OF FLORIDA, INC.		*TYPE CT -STAT 15 *EXP 970201	
1 130720KF AL 930720		931007 60	01
NINOR AMENDMENT 920728KO TC 920728	930825 AMENDED 8/25/93, TO CHANGE 8 920728 920810	920812 60	00
	0 920310 920318	920629 60	01
NINCR AMENDMENT			
	1 911001 911011 1 890711 890720	920131 60 890828 60	00
	2 861020 861028 880713	560610 60	01 900610
PETITION FOR RECONSIDERATI		PETITION FOR RECONSIDERATION	
PLEADING		RECONSIDERATION/DEWNIS J. KEI	.L*
PETITION FOR RECONSIDERATI MINOR AMENDMENT	iow fileb 880713 PETITON FOR RECONSIDERATION 60 FT 11-19-86 TO GIVE U		
86092347 8 860923	3 862923 861001		02
MINOR AMENDMENT	870120 AMENDED 1-20-87 TO GIVE RE		
WINOR AMENDMENT	870106 AMENDED 1-6-87 TO SHOW ST	ATEM	

																•	RID (11	
56 OF	SERVICE +1	· •			BAPS	FACILIT	Y/APPLICAT	ION INF	OPMATION	REPOR	tT.	FR)H 39	/01/01	TO 95/	04/27	BAPOZO Page	
ARN C	P-APP-ARM	TYPE	REC'D	ACCEPT	PH-ACC	PETITE	LOCREL CUT	OFF TOH	ERR FRHEA	AR FIN	IAL-D	TE BOC	ET P	RIOR-A	RN SAMO	CP-EXI	•	
09KH 03K6 06KI 001KM		TC P WL R	841003 821006	841003	86101		,			85	0402	60			00 00	86100)2	
)56KH		*		781016														
01LH 25KH 13KG		R AL AL	920401 911125	920401	920410 911200 851121	801223				• T Y P 9 3 9 1 8 5	E CT 30310 11217	•STAT			70801 • 00 00	PC WAFY	93	303°
OIKS MINOR					87041	70527				87 APPLI	0716	60	IAN-A'	777				
25KK 112KE 107KF 129KL	1 MF wa m F w 1	7 C	831212 831207	#31212 #31209	#31219 #31210					84 84 83	0523 0524 1220	60 60			00		:4	
07KL 18KH 12K\$ 01KI		P MP MP	830512 821101	830512 821101	830723 821113	; !	***************************************			81 83 83	0212 10914 10524 1215	60 60	-558		00 00 00	83112 83061	4 2	
	PPS HOWARE	BR0#	940525 940525	46 CO CI 940525 940525	P40614	•	0N 4	CHAN-S		+TYP 94 94	E CT 0617 0617	*\$TA1	15 4	EXP 9	71001 • 00 00	PC WEWS		.10
HINOR 13KM O1KM PLEAD	186	TC R	880613	880613	880623 87061	20716 3 671013 180301	PETITION	TO RECO	VSIDER DE	88 87 Mial	0623 0911 0F 1	60 IS 18F0			TOW.	••		
PLEAD MINOR	ING	•				371013 370626	INFORMAL	OBJECTIO	ON TO LIC	EMSE .5 WIT 79	RENE!	#AL\$/\$0 -60		ILI HAL	ISE, ES IXX OO	٥.		
1544		*		U	NION C	t T Y	MJ •	CHAN-27				*\$747	05	EIP		PC 8810	07KQ 89	11
113K6	881007*0	MP P			890630			11-8-44	70 9581 B	88	1202	60			ÕÕ	89120		
	-				AGINAN		-			- 7 7 P	E CT		15 •	EXP 97		PC WETI	97	10
SZTÉN MINOR		.*			•	279818	***	-18-97,1	TO SUPPLY	······································					•			
517#F 529##		1 <u>C</u>	\$ 1 C K 2 G	#7052 9						8.7	911	♦ *)			$-i\dot{\phi}$			
	ART OPEN TO THE PROPERTY OF TH	ARN CP-APP-ARN OPKH OSKG OOKI OIKM ZOKH MEVV, INC. OILM ISKG PLEADING OIKG AMENDMENT ZOKL AMENDMENT ISKG ISKC ISKC	OPKH TC OSK6 P OOKI NI OOKI	ARN CP-APP-ARN TYPE REC'B 1 DOWN TC 851209 DOKE P 841003 DOKE R 811001 ZOKM R 811001 ZOKM R 780926 AL 780616 WEYV, INC. DILM R 920401 WEYV, INC. BY 801125 DILM R 920401 WEYV, INC. BY 801125 WEYV, INC. WEYV, INC. BY 801125 WEYV, INC. WEYN, INC. WEYN, INC. WEYN, INC. WEYN, INC. WEYN, INC. WEYV, INC. WEYN, I	ARN CP-APP-ARN TYPE REC'D ACCEPTOR OPKH TC 851209 851209 OSK6 P 841003 841005 OSK6 P 841003 841005 OSKI NL 821006 821006 OSKN R 811001 811013 R 780926 781016 AL 780616 MEVV, INC. P 920401 920401 OSKN AL 911125 911125 OSKN AL 911125 911125 OSKN AL 911125 911125 OSKN AL 911125 911125 OSKN AL 851113 851113 OSKN AL 911125 911125 OSKN AL 911125 911125 OSKN AL 851113 851113 OSKN AL 851113 851113 OSKN AL 851113 851113 OSKN AL 851113 851113 OSKN AL 851129 831129 WINOR AMENDHENT OSKN AL 831207 831209 OSKN AL 831207 831209 OSKN AMENDHENT OSKN P 830512 830512 OSKN P 830512 830512 OSKN P 830512 830512 OSKN P 830512 820712 SCRIPPS NOWARD BROADCASTING CO CC OSSK T P 800525 940525 OSKN AL 940525 940525 OSKN R 870601 870601 OSKN AMENDHENT OSKN AMENDHENT OSKN R 870601 870601 ISRAC BLOWDEP OSKN R 890613 890613 OSKN R 890613 890613	ARN CP-APP-ARN TYPE REC'D ACCEPT PW-ACC DOWN TC 851209 851209 851210 DSKG P 841003 841003 841012 DOKK R 811001 811013 811021 DOKK R 811001 811013 811021 DOKK R 780926 781016 AL 780616 WEYV, INC. DILM R 920401 920401 920401 DSKM AL 911125 91125 91120 DILM R 920401 920401 920401 DSKM AL 911125 91125 91120 DILM R 920401 870401 870401 DILM R 920401 870401 870401 DILM R 920401 870401 87041 EVANSVII DILM R 920401 920401 920411 DILM R 920401 920401 920411 DILM R 920401 870401 870401 DILM R 920401 870401 870401 DILM R 870401 870401 870401 DILM R 870401 870401 870401 DILM R 830122 831212 DILM R 830122 831212 DILM R 930718 830718 830721 DILM R 830512 830512 DILM R 830512 DILM R 830512 830512 DILM R 8	ARN CP-APP-ARN TYPE REC'D ACCEPT PN-ACC PETITM: 09xm	ARN CP-APP-ARN TYPE REC'D ACCEPT PN-ACC PETITW LOCREL CUTONS AND CONTROL OF ACCEPT PN-ACCEPT PN-	ARN CP-APP-ARN TYPE REC'S ACCEPT PN-ACC PETITN LOCREL CUTOFF TON DOWN TC 851209 851209 851213 DIKK P 841003 841003 841017 DOKI N 8 811001 811013 811020 DIKK P 811001 811013 811020 DIKK P 811001 811013 811020 DIKK P 780966 MEYV, INC.	ARN CP-APP-ARN TYPE REC'D ACCEPT PN-ACC PETITH LOCREL CUTOFF TOMEAR FRME: 09KH TC 851209 851209 851213 05KG P 841003 841003 841017 09KI NL 821006 821006 821026 07KM R 811001 811013 811020 AC P 841003 811013 811020 AC P 811001 811013 811020 AC P 811001 811013 811020 AC P 811001 81013 811020 AC P 811001 81013 811020 AC P 811001 81013 811020 AC P 811001 870401 920410 10KB A	ARN CP-APP-ARN TYPE REC'D ACCEPT: PW-ACC PETITW LOCREL CUTOFF TOMEAR FRHEAR FILED ON THE CONTROL OF THE COTOFF TOMEAR FRHEAR FILED ON THE COTOFF TOMEAR FRHEAR FILED FILED ON THE COTOFF TOMEAR FRHEAR FILED ON TH	ARN CP-APP-ARN TYPE REC'D ACCEPT PN-ACC PETITW LOCREL CUTOFF TOMEAR FRHEAR FINAL-D DOWN TC 851209 851209 851215 851215 D3X6 P 841003 841003 841017 850402 D6X1 NL 820006 821006 821026 920016 821017 D1XN R 811001 811013 811020 820127 D1XN R 780926 781016 7800327 AL 780946 7800327 D1XN AL 911125 911206 911217 D1XX AL 851113 851113 8511210 821223 D1XX AL 851113 851113 851121 881223 D1XX AL 851113 851113 851121 881223 D1XX AL 851113 851113 851121 881223 D1XX AL 851123 851121 881223 D1XX AL 851025 841025 84102 D1XX AL 861025 841025 84102 D1XX AL 861025 84102 811229 81229 D1XX AL 861025 84102 811229 81229 D1XX AL 861025 861025 861102 D1XX AL 861025 861025 861102 D1XX AL 861025 861025 861102 D1XX AL 861025 861025 861025 D1XX AL 861025 861025 861025 D1XX AL 860613 880613 880623 D1XX AL 861025 861025 D1XX AL 861025 86102 871021 D1XX AL 861025 86102 87102 871021 D1XX AL 861025 86102 87102 871021 D1XX AL 870027 8700272 D1XX AL 8700272 D	ARN CP-APP-ARN TYPE REC'S ACCEPT PW-ACC PETITW LOCREL CUTOFF TOMEAR FRHEAR FINAL-DTE DOCS DOSK	ARN CP-APP-ARN TYPE REC'S ACCEPT PN-ACC PETITW LOCREL CUTOFF TOHEAR FRHEAR FINAL-DTE BOCKET POOPEN TO STORY	ARM (P-APP-APR TYPE REC'D ACCEPT PM-ACC PETITW LOCREL CUTOFF TOMEAR FRHEAR FINAL-DTE BOCKET PRIOR-AL DOWN TC 851709 851709 851709 851707 851707 851709 8517	ARN (P-APP-ARN TIPE REC'S ACCEPT PW-ACC PETITW LOCREL CUTOFF TOMEAR FRHEAR FINAL-STE DOCKET PRIOR-ARN FARN FARN FARN FARN FARN FARN FARN F	ARM CP-APP-APH TYPE REC'S ACCEPT PM-ACC PETITW LOCKEL CUTOFF TOMEAR FRHEAR FINAL-DTE DOCKET PRIOR-ARM FARD CP-EXP 109VW TC 851209 851209 851207 850213 850017 850017 850402 40 00 00 86100 105XK P 841003 841003 810017 90 00 00 86100 105XK R R 811001 811013 811020 820014 40 00 00 86100 105XK R R 811001 811013 811020 820012 40 00 00 00 800317 60 00 800317 60 00 800317 60 00 800317 60 00 800317 60 00 800317 60 00 800317 60 00 800317 60 00 800317 60 00 800317 60 800317 60 00 800317 60 80031 80	PAGE ARM (CP-APP-ARM TYPE REC'S ACCEPT PW-ACC PETITW LOCREL CUTOFF TOHEAR FRHEAR FINAL-DTE BOCKET PRIOR-ARM PAMP CP-EXP DOWN TC 851209 851209 655215 DOSC P 841003 841013 841017 B 811000 821004 821026 DOKE P 841003 841013 841017 B 811000 821004 821026 DOKE P 841003 841013 841017 B 811000 821004 821026 DOKE P 841003 841013 811020 B 81001 811013 811020 B 81001 811013 811020 B 81001 811013 811020 B 81002 900 00 DOKE P 841004 820040 920040 DOKE P 841005 841013 811020 B 820127 60 00 DOKE P 841013 851113 85112 881223 DOKE P 84101 87001 870041 820040 DOKE P 84101 87001 870041 820040 DOKE P 841004 87004 870040 870040 B 851113 85112 85112 85112 851223 DOKE P 84102 841025 841027 841027 B 84102 841025 841027 841027 B 84102 841027 84102 841

CHRONOLOGY OF PLEADINGS

Channel Swap and Collateral Proceedings

Attached is a set of chronologies listing the pleadings filed in connection with the Channel Swap and the Collateral Proceedings.

Chronology A provides a master list of all pleadings filed by the Commercial Competitors, the University and SCC involving the Collateral Proceedings and the Channel Swap since the September 1992 filing of SCC's and the University's Joint Petition for Issuance of a Notice of Proposed Rulemaking to Exchange Channels.

Chronology B lists those pleadings pertaining to the Commercial Competitors' challenges to the extension of the Cheyenne Mountain Construction Permit.

Chronology C lists those pleadings pertaining to Pikes Peak's challenges to SCC's authorization for TV Translator K15BX, Colorado Springs, Colorado.

MASTER CHRONOLOGY OF ALL PLEADINGS

D-4 (.F'')	m'al a lara completi
Date of Filing	Title and Nature of Pleading
September 8, 1992	Joint Petition for Issuance of Notice of Proposed Rulemaking filed by the University of Southern Colorado (the "University") & Sangre de Cristo Communications, Inc. ("SCC")
	• Requesting the initiation of a rulemaking proposing an intra-band VHF channel swap between the University and SCC.
October 5, 1992	Petition for Reconsideration filed by Pikes Peak Broadcasting Company ("Pikes Peak")
	• Requesting rescission of the Commission's grant of the University's application to relocate KTSC-TV's transmitter site to Cheyenne Mountain.
October 8, 1992	Petition for Reconsideration filed by KKTV, Inc. ("KKTV")
	• Requesting rescission of the Commission's grant of the University's application to relocate KTSC-TV's transmitter site to Cheyenne Mountain.
October 20, 1992	Opposition to Petition for Reconsideration filed by the University
October 22, 1992	Reply to Opposition to Petition for Reconsideration filed by Pikes Peak
November 19, 1992	Petition for Reconsideration filed by Pikes Peak
	 Requesting rescission of the Commission's grant of SCC's extension of time application for Translator K15BX, Colorado Springs, Colorado.
November 25, 1992	Petition for Reconsideration filed by Pikes Peak
	 Requesting rescission of the Commission's grant of SCC's reinstatement application for Translator K15BX, Colorado Springs, Colorado

December 2, 1992	Petition for Issuance of Order to Show Cause filed by Pikes Peak
	• Requesting issuance of an Order to Show Cause why the University's Cheyenne Mountain construction permit should not be revoked.
December 4, 1992	Petition for Issuance of Order to Show Cause filed by KKTV
	• Requesting issuance of an Order to Show Cause why the University's Cheyenne Mountain construction permit should not be revoked.
December 8, 1992	Consolidated Opposition to Petitions for Reconsideration filed by SCC
December 18, 1992	Reply to Consolidated Opposition to Petitions for Reconsideration filed by Pikes Peak
January 8, 1993	Joint Consolidated Opposition to Petitions for Issuance of Order to Show Cause filed by the University and SCC
January 22, 1993	Reply to Joint Consolidated Opposition to Petitions for Issuance of Order to Show Cause filed by Pikes Peak
January 22, 1993	Reply to Joint Consolidated Opposition to Petitions for Issuance of Order to Show Cause filed by KKTV
February 9, 1993	Petition for Reconsideration filed by Pikes Peak
	• Requesting the rescission of the Commission's grant of special temporary authority to rebroadcast programming of KTSC(TV), Channel 5*, Pueblo, Colorado, over Translator K15BX, Colorado Springs, Colorado.

February 17, 1993	Notice of Intent to Object filed by Pikes Peak
	 Declaring that Pikes Peak would oppose any application requesting extension of the outstanding Cheyenne Mountain Permit.
February 19, 1993	Petition to Revoke and Deny CP Extension filed by Pikes Peak
	• Requesting the revocation of the Cheyenne Mountain Permit and the denial of the University's application for extension of the construction permit.
February 24, 1993	Opposition to Petition for Reconsideration filed by SCC
March 2, 1993	Joint Motion for Issuance of an Order to Show Cause filed by the University and SCC
	• Requesting issuance of an order to show cause why Pikes Peak & KKTV should not be ordered to cease and desist their abuse of the FCC's processes.
March 2, 1993	Petition to Deny Application for Extension of Construction Permit and Supplement to Petition for Issuance of Order to Show Cause Why Construction Permit Should Not Be Revoked filed by KKTV
	• Requesting the denial of the University's application for extension of the construction permit.
March 4, 1993	Joint Opposition to Petition to Revoke and Deny CP Extension filed by the University and SCC
March 8, 1993	Reply to Opposition to Petition for Reconsideration filed by Pikes Peak
March 16, 1993	Reply to Joint Opposition to Petition to Revoke and Deny CP Extension filed by Pikes Peak
March 16, 1993	Opposition to Joint Motion for Issuance of Order to Show Cause filed by Pikes Peak

March 16, 1993	Opposition of KKTV, Inc. to Joint Motion for Issuance of an Order to Show Cause
March 17, 1993	Joint Opposition to KKTV Petition to Deny Application for Extension of Construction Permit and Supplement to Petition for Issuance of Order to Show Cause Why Construction Permit Should Not Be Revoked filed by the University and SCC
March 22, 1993	Reply of KKTV, Inc. to Joint Opposition to Petition to Deny Application of Extension of Construction Permit and Supplement to Petition for Issuance of Order to Show Cause Why Construction Permit Should Not Be Revoked
March 23, 1993	Amendment to Extension Application for KTSC(TV) Cheyenne Mountain construction permit filed by the University
March 29, 1993	Joint Consolidated Reply to Oppositions to Joint Motion for Issuance of Order to Show Cause
April 6, 1993	Supplement of KKTV, Inc. to Petition to Deny Application of the University of Southern Colorado for Extension of Construction Permit and Supplement to Petition for Issuance of Order to Show Cause Why Construction Permit Should Not Be Revoked
	• Requesting the dismissal of the University's amendment to its extension application, the denial of the extension application and the revocation of the permit.
April 7, 1993	Supplement to Petition to Revoke and Deny CP Extension filed by Pikes Peak
	• Requesting the dismissal of the University's amendment to its extension application, the denial of the extension application and the revocation of the permit.

April 13, 1993	Motion of KKTV, Inc. for Leave to File Limited Reply to Joint Consolidated Reply to Oppositions to Joint Motion for Issuance of an Order to Show Cause & Limited Reply to Joint Consolidated Reply to Oppositions to Joint Motion for Issuance of an Order to Show Cause
	 Responding to suggestion that KKTV or its representatives caused the issuance of the duplicate public notice of grant of the University's application to relocate KTSC(TV)'s transmitter to Cheyenne Mountain.
April 21, 1993	Opposition to Supplement of KKTV to Petition to Deny and Petition for Issuance of Order filed by the University and SCC
April 22, 1993	Joint Opposition to Pikes Peak Supplement to Petition to Revoke and Deny CP Extension filed by the University and SCC
April 28, 1993	Comments to Limited Reply of KKTV to Joint Consolidated Reply to Oppositions to Joint Motion for Issuance of an Order to Show Cause filed by the University and SCC
May 14, 1993	Petition to Deny University's Applications for New UHF Translator Stations at Grand Junction, Cortez-Red Mesa, Durango and Ignacio, Colorado filed by Pikes Peak
	Requesting denial of the University's television

• Requesting denial of the University's television translator applications or, in the alternative, that the FCC hold any further consideration of the applications in abeyance pending resolution of the other proceedings involving the University and initiated earlier by Pikes Peak

May 10, 1993	Supplement to Petition to Revoke and Deny CP Extension filed by Pikes Peak
	 Requesting the denial of the University's extension application.
May 19, 1993	Joint Opposition to Supplement to Petition to Revoke and Deny CP Extension filed by the University and SCC
May 25, 1993	Opposition to Petition to Deny filed by the University
June 2, 1993	Reply to Joint Opposition to Supplement to Petition to Revoke and Deny CP Extension filed by Pikes Peak
July 6, 1993	Notice of Intent to Object filed by Pikes Peak
July 9, 1993	Opposition to Extension of STA filed by Pikes Peak
	 Requesting the denial of SCC's request for extension of special temporary aurhtority to rebroadcast programming of KTSC(TV), Channel 5*, Pueblo, Colorado over Translator K15BX, Colorado Springs, Colorado.
July 22, 1993	Response to Opposition filed by SCC
August 16, 1993	Petition to Deny University's Applications for New UHF Translator Stations at Grand Junction, Cortez-Red Mesa, Durango and Ignacio, Colorado filed by Pikes Peak
	• Requesting denial of the University's television translator applications or, in the alternative, that the FCC hold any further consideration of the applications in abeyance pending resolution of the other proceedings involving the University and initiated earlier by Pikes Peak

Peak

August 26, 1993

Joint Motion to Consolidate Proceedings filed by the University and SCC

• Requesting consolidation of resolution of (1) proposed channel swap, (ii) reconsideration of grant of extension of time to construct, reinstatement of construction permit for and extension of STA for Television Translator K15BX, Colorado Springs, Colorado; (iii) extension and assignment of Cheyenne Mountain Permit; and (iv) petitions to deny University's proposed Grand Junction, Cortez-Red Mesa, Durango and Ignacio, Colorado UHF translators in the channel swap rulemaking.

August 31, 1993

Opposition to Petition to Deny filed by University

August 31, 1993

Opposition of KKTV, Inc. to Joint Motion to Consolidate Proceedings

September 3, 1993

Joint Comments of University and SCC

• Supporting approval of channel swap presented in September 8, 1992 Joint Petition in response to Notice of Proposed Rule Making, MM Docket No. 93-191 (July 13, 1993).

September 3, 1993

Comments of KKTV

• Opposing approval of channel swap presented in September 8, 1992 Joint Petition in response to Notice of Proposed Rule Making, MM Docket No. 93-191 (July 13, 1993).

September 3, 1993

Comments of Pikes Peak

• Opposing approval of channel swap presented in September 8, 1992 Joint Petition in response to Notice of Proposed Rule Making, MM Docket No. 93-191 (July 13, 1993).

September 8, 1993

Opposition to Joint Motion to Consolidate Pleadings filed by Pikes Peak

September 13, 1993	Reply to Opposition to Petition to Deny University Translator Applications filed by Pikes Peak
September 13, 1993	Joint Reply to Opposition to Joint Motion to Consolidate Proceedings filed by University and SCC
September 27, 1993	Joint Reply Comments of University and SCC
September 27, 1993	Reply Comments of KKTV
September 27, 1993	Reply Comments of Pikes Peak
September 27, 1993	Second Supplement to KKTV Petition to Deny Application of the University for Extension of Construction Permit and Supplement to KKTV Petition for Issuance of Order to Show Cause why Construction Permit Should Not Be Revoked filed by KKTV
October 14, 1993	Further Supplement to Pikes Peak Petition to Revoke and Deny CP Extension filed by Pikes Peak
October 15, 1993	Petition to Deny University Application to Assign KTSC Construction Permit to SCC filed by Pikes Peak
October 15, 1993	Petition to Deny Application of University for Consent to Assignment of Construction Permit filed by KKTV
October 27, 1993	Opposition to Further Supplement to Petition to Revoke and Deny CP Extension filed by the University
October 28, 1993	Petition to Deny Application to Modify Construction Permit filed by Pikes Peak
October 28, 1993	Opposition to Application for Modification of Construction Permit filed by KKTV
October 28, 1993	Joint Consolidated Opposition to Petitions to Deny CP Assignment Application filed by the University and SCC

November 10, 1993	Opposition to Objections to CP Modification filed by the University
November 22, 1993	Reply to Opposition to Petition to Deny Application to Modify Construction Permit filed by Pikes Peak
July 14, 1995	Decision of the Allocations Branch Denying Channel Exchange ("Staff Decision")
August 14, 1995	Joint Application for Review of the Staff Decision filed by the University and SCC

• Requesting reversal of the Staff Decision and grant of the Channel Swap as proposed by University and SCC (to include the Cheyenne Mountain Permit)

Chronology of Pleadings

Regarding

KTSC(TV) Cheyenne Mountain Construction Permit (September, 1992 - September, 1993)

Date	of	Fil	lin	_
Date	OI.	$\Gamma \Pi$	ш	צ

Title and Nature of Pleading

October 5, 1992

Petition for Reconsideration filed by Pikes Peak Broadcasting Company ("Pikes Peak")

• Requesting rescission of the Commission's grant of the University's application to relocate KTSC-TV's transmitter site to Cheyenne Mountain.

October 8, 1992

Petition for Reconsideration filed by KKTV, Inc. ("KKTV")

- Requesting rescission of the Commission's grant of the University's application to relocate KTSC-TV's transmitter site to Cheyenne Mountain.
 - Opposition to Petitions for Reconsideration filed by the University (October 20, 1992)
 - Reply to Opposition to Petition for Reconsideration filed by Pikes Peak (October 22, 1992)

December 2, 1992

Petition for Issuance of Order to Show Cause filed by Pikes Peak

• Requesting issuance of an Order to Show Cause why the University's Cheyenne Mountain construction permit should not be revoked.

December 4, 1992

Petition for Issuance of Order to Show Cause filed by KKTV

- Requesting issuance of an Order to Show Cause why the University's Cheyenne Mountain construction permit should not be revoked.
 - Joint Consolidated Opposition to Petitions for Issuance of Order to Show Cause filed by the University and SCC (January 8, 1993)

- Reply to Joint Consolidated Opposition to Petitions for Issuance of Order to Show Cause filed by Pikes Peak (January 22, 1993)
- Reply to Joint Consolidated Opposition to Petitions for Issuance of Order to Show Cause filed by KKTV (January 22, 1993)

February 17, 1993

Notice of Intent to Object filed by Pikes Peak

• Declaring that Pikes Peak would oppose any application requesting extension of the outstanding Cheyenne Mountain Permit.

February 19, 1993

Petition to Revoke and Deny CP Extension filed by Pikes Peak

- Requesting the revocation of the Cheyenne Mountain Permit and the denial of the University's application for extension of the construction permit.
 - Joint Opposition to Petition to Revoke and Deny CP Extension filed by the University and SCC (March 4, 1993)
 - Reply to Joint Opposition to Petition to Revoke and Deny CP Extension filed by Pikes Peak (March 16, 1993)

March 2, 1993

Petition to Deny Application for Extension of Construction Permit and Supplement to Petition for Issuance of Order to Show Cause Why Construction Permit Should Not Be Revoked filed by KKTV

• Requesting the denial of the University's application for extension of the construction permit.

- Joint Opposition to KKTV Petition to Deny Application for Extension of Construction Permit and Supplement to Petition for Issuance of Order to Show Cause Why Construction Permit Should Not Be Revoked filed by the University and SCC (March 17, 1993)
- Reply of KKTV, Inc. to Joint Opposition to Petition to Deny Application of Extension of Construction Permit and Supplement to Petition for Issuance of Order to Show Cause Why Construction Permit Should Not Be Revoked (March 22, 1993)

March 23, 1993

Amendment to Extension Application for KTSC(TV) Cheyenne Mountain construction permit filed by the University

- Application of the University of Southern Colorado for Extension of Construction Permit and Supplement to Petition for Issuance of Order to Show Cause Why Construction Permit Should Not Be Revoked (April 6, 1993)
 - Requesting the dismissal of the University's amendment to its extension application, the denial of the extension application and the revocation of the permit.
- Supplement to Petition to Revoke and Deny CP Extension filed by Pikes Peak (April 7, 1993)
 - Requesting the dismissal of the University's amendment to its extension application, the denial of the extension application and the revocation of the permit.
- Opposition to Supplement of KKTV to Petition to Deny and Petition for Issuance of Order filed by the University and SCC (April 21, 1993)

- Joint Opposition to Pikes Peak Supplement to Petition to Revoke and Deny CP Extension filed by the University and SCC (April 22, 1993)

May 10, 1993

Supplement to Petition to Revoke and Deny CP Extension filed by Pikes Peak

- Requesting the denial of the University's extension application.
 - Joint Opposition to Supplement to Petition to Revoke and Deny CP Extension filed by the University and SCC (May 19, 1993)
 - Reply to Joint Opposition to Supplement to Petition to Revoke and Deny CP Extension filed by Pikes Peak (June 2, 1993)

August 26, 1993

Joint Motion to Consolidate Proceedings filed by the University and SCC

- Requesting consolidation of resolution of (1) proposed channel swap, (ii) reconsideration of grant of extension of time to construct, reinstatement of construction permit for and extension of STA for Television Translator K15BX, Colorado Springs, Colorado; (iii) extension and assignment of Cheyenne Mountain Permit; and (iv) petitions to deny University's proposed Grand Junction, Cortez-Red Mesa, Durango and Ignacio, Colorado UHF translators in the channel swap rulemaking.
 - Opposition of KKTV, Inc. to Joint Motion to Consolidate Proceedings (August 31, 1993)
 - Opposition to Joint Motion to Consolidate Proceedings filed by Pikes Peak (September 8, 1993)
 - Joint Reply to Opposition to Joint
 Motion to Consolidate Proceedings filed
 by University and SCC (September 13,
 1993)

September 2, 1993

Application of the University to Assign Cheyenne Mountain Permit to SCC

- Petition to Deny University Application to Assign KTSC Construction Permit to SCC filed by Pikes Peak (October 15, 1993)
- Petition to Deny Application of University for Consent to Assignment of Construction Permit filed by KKTV (October 15, 1993)
- Joint Consolidated Opposition to Petitions to Deny CP Assignment Application filed by the University and SCC (October 28, 1993)

September 14, 1993

Supplement to Application to Extend KTSC Construction Permit

- Second Supplement to KKTV Petition to Deny Application of the University for Extension of Construction Permit and Supplement to KKTV Petition for Issuance of Order to Show Cause why Construction Permit Should Not Be Revoked filed by KKTV (September 27, 1993)
- Further Supplement to Pikes Peak Petition to Revoke and Deny CP Extension filed by Pikes Peak (September 27, 1993)
- Opposition to Further Supplement to Petition to Revoke and Deny CP Extension filed by the University (October 27, 1993)

September 28, 1993

Amendment to Cheyenne Mountain Permit filed by the University

- Petition to Deny Application to Modify CP filed by Pikes Peak (October 28, 1993)
- Opposition to Application for Modification of Construction Permit (October 28, 1993)

- Opposition to Objections to CP Modification filed by the University (November 10, 1993)
- Reply to Opposition to Petition to Deny Application to Modify CP filed by Pikes Peak (November 22, 1993)

July 14, 1995

Decision of the Allocations Branch Denying Channel Exchange and Consolidation of Proceedings ("Staff Decision")

- Joint Application for Review of the Staff Decision filed by the University and SCC (August 14, 1995)
 - Requesting reversal of the Staff Decision and grant of the Channel Swap as proposed by University and SCC (to include the Cheyenne Mountain Permit)

Chronology of Pleadings

Regarding

TV Translator K15BX, Colorado Springs, Colorado (September, 1992 - September, 1993)

Date of Filing

Title and Nature of Pleading

November 19, 1992

Petition for Reconsideration filed by Pikes Peak

• Requesting rescission of the Commission's grant of SCC's extension of time application for Translator K15BX, Colorado Springs, Colorado.

November 25, 1992

Petition for Reconsideration filed by Pikes Peak

- Requesting rescission of the Commission's grant of SCC's reinstatement application for Translator K15BX, Colorado Springs, Colorado
 - Consolidated Opposition to Petitions for Reconsideration filed by SCC (December 8, 1992)
 - Reply to Consolidated Opposition to Petitions for Reconsideration filed by Pikes Peak (December 18, 1992)

February 9, 1993

Petition for Reconsideration filed by Pikes Peak

- Requesting the rescission of the Commission's grant of special temporary authority to rebroadcast programming of KTSC(TV), Channel 5*, Pueblo, Colorado, over Translator K15BX, Colorado Springs, Colorado.
 - Opposition to Petition for Reconsideration filed by SCC (February 24, 1993)
 - Reply to Opposition to Petition for Reconsideration filed by Pikes Peak (March 8, 1993)